

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ContentGuard Holdings, Inc.,

Plaintiff,

-against-

Amazon.com, Inc.; Apple Inc.; BlackBerry Limited (fka Research In Motion Limited) and BlackBerry Corporation (fka Research In Motion Corporation); DirecTV, LLC; HTC Corporation and HTC America, Inc.; Huawei Technologies Co., Ltd. and Huawei Device USA, Inc.; Motorola Mobility LLC; Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC.

Defendants.

ContentGuard Holdings, Inc.,

Plaintiff,

-against-

Google, Inc.

Defendant.

Civil Action No. 2:13-cv-01112-JRG

JURY TRIAL DEMANDED

Civil Action No. 2:14-cv-00061-JRG

JURY TRIAL DEMANDED

JOINT NOTICE REGARDING MARKMAN HEARING

Pursuant to the Court's Docket Control Orders, the parties respectfully request that the Court set aside a total of 3.5 hours for the February 6, 2015, claim construction hearings in the above-captioned cases. The parties respectfully request that (i) 3 hours, to be divided evenly between ContentGuard and the Defendants group, be set aside for claim construction argument; and (ii) 30 minutes, to be divided evenly between ContentGuard and Defendant Amazon.com,

Inc., be set aside for argument on Amazon.com, Inc.'s Motion to Dismiss the Second Amended Complaint (*Amazon* Dkt. 298).

Given the large number of disputed claim terms, the parties respectfully submit that oral argument should be focused on the following 12 terms, in the order presented below:

A. Terms and terms that appear in both the Stefik patents ('859, '072, '576, '956, '007, and '160) and the Chen/Nguyen patents ('280 and '053)

1. Repository/Trusted
2. Identification certificate
3. Usage rights
4. Manner of use
5. Digital document/Digital work/Digital content
6. Document platform
7. Render(ing/ed/able)
8. Distributed repository
9. Having a grammar

B. Terms that appear only in the Chen/Nguyen patents ('280 and '053)

10. Meta-right
11. State variable

C. Term that appears only in the Dunkeld patent ('556)

12. Detect(ing)

The parties stand ready to address terms that do not appear on the above list, should the Court be interested in hearing argument.

DATED: January 23, 2015

Respectfully submitted,

/s/ Sam Baxter

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via the Court's ECF system on January 23, 2015.

/s/ Sam Baxter
Sam Baxter